

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

UNITED STATES OF AMERICA	)	CASE NO. 1: 13 CV 1455
	)	
Plaintiff,	)	JUDGE DONALD C. NUGENT
	)	
vs.	)	<b><u>CLAIMANT'S MOTION TO</u></b>
	)	<b><u>CONTINUE EVIDENTIARY</u></b>
\$526,695.24 SEIZED FROM JP	)	<b><u>HEARING.</u></b>
MORGAN3 CHASE BANK	)	
INVESTMENT ACCT #74068415, et.	)	
al.	)	
Defendants.	)	

NOW COMES Claimant, Sbeih Sbeih, by and through undersigned counsel, and hereby respectfully moves this Honorable Court to continue the evidentiary hearing currently set for Friday, August 30, 2019, at 9:00 a.m., to a date convenient with Court in April 2020.

Mr. Sbeih is currently in Jerusalem where he has been living since August 2008. At all relevant times following the issuances of an arrest warrant on his related criminal case Mr. Sbeih has been engaged in legal proceedings to gain his Permanent Resident status in Israel. *See* Doc. 190, ¶ 3. Although Mr. Sbeih was granted Permanent Resident status, his spouse and children were not. His spouse and children were only granted temporary status. Consequently, Mr. Sbeih appealed the decision to the Immigration Tribunal: Case 3376/17.

Mr. Sbeih, with the assistance of an attorney, requested the Immigration Tribunal grant his family Permanent Resident status based on the fact they lived in Jerusalem for a period of more than 10 years. Mr. Sbeih's family's appeal remains pending through February or March 2020. And while their appeal remains pending a prolonged absence on the part of Mr. Sbeih shall prove fatal to his family's appeal.

After consideration of the above, the United States government does not object to a continuance of the evidentiary hearing provided the Court does not schedule the evidentiary hearing during the week commencing on Monday, March 30, 2020 and ending on Friday, April 3, 2020.

For the foregoing reasons, Claimant Sbeih Sbeih respectfully asks this Honorable Court for a continuance of the evidentiary hearing scheduled for Friday, August 30, 2019, at 9:00 a.m., to a date convenient with Court in April 2020.

Respectfully submitted,

RASLANPLA & COMPANY, LLC

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ATTORNEYS FOR CLAIMANT  
SBEIH A. SBEIH

### **CERTIFICATE OF SERVICE**

This is to certify that the foregoing MOTION TO CONTINUE was electronically filed and provided to all counsel of record through the Court's Electronic Filing System on this 25th day of August 2019.

/s/ Jorge Luis Pla  
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